

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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In the Matter of the Application of

TRUMP VILLAGE SECTION 4, INC.

Petitioner,

**NOTICE OF PETITION TO  
STAY ARBITRATION**

For a judgment to stay the arbitration  
commenced by

LOCAL 804 INTERNATIONAL BROTHERHOOD OF  
TEAMSTERS

Civil Action No. \_\_\_\_\_

Respondents.

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MOTION BY:

Daniel Murphy, Esq., on behalf of Petitioner, Trump  
Village Section 4, Inc.

PLACE, DATE & TIME:

On July \_\_\_, 2022 or as soon thereafter as counsel may be  
heard at the United States District Court, Eastern District of  
New York, 225 Cadman Plaza East, Brooklyn, New York  
11201.

SUPPORTING PAPERS:

Verified Petition to Stay Arbitration, dated July 5, 2022;  
Affidavit of Igor Oberman, sworn to July 5, 2022;  
Memorandum of Law in Support of Verified Petition to  
Stay Arbitration, dated July 5, 2022.

RELIEF REQUESTED:

An Order granting the following relief: (a) stay of  
arbitration improperly demanded by Respondents pursuant  
to 9 U.S.C. § 1 *et seq*; and (b) for such other and further  
relief as the Court may deem just and proper.

BASIS FOR RELIEF

REQUESTED:

9 U.S.C. § 1, *et seq*. and 29 U.S.C. § 185.

RESPONDING PAPERS:

Petitioner intends to file and serve reply papers. Therefore, Respondents are required to serve and file opposing papers at least eight (8) business days prior to the return date.

DATED: New York, New York  
July 5, 2022

Respectfully submitted,

BOND, SCHOENECK & KING, PLLC

By: /s/ Theresa Rusnak

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